

EXHIBIT 2

**IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

| | | |
|---|---|--------------------|
| COREY BATCHELOR, |) | |
| |) | |
| Plaintiff, |) | |
| |) | |
| v. |) | |
| |) | |
| CITY OF CHICAGO; special representative |) | No. 1:18-cv-08513 |
| for ROBERT RICE, deceased; |) | |
| MICHAEL BOSCO; special representative |) | |
| for LAWRENCE NITSCHKE, deceased; |) | Hon. John F. Kness |
| special representative for THOMAS KEOUGH, |) | |
| deceased; DANIEL McWEENY; FNU |) | |
| McGOVERN; JAMES McARDLE; ROBERT |) | |
| TOVAR; GEORGE WINISTORFER; ROBERT |) | |
| FLOOD; and as-yet UNKNOWN OFFICERS |) | |
| OF THE CHICAGO POLICE DEPARTMENT, |) | |
| |) | |
| Defendants. |) | |

**PLAINTIFF'S THIRD SET OF
INTERROGATORIES TO DEFENDANT CITY OF CHICAGO**

Pursuant to Federal Rule of Civil Procedure 33, Plaintiff Corey Batchelor, by his attorneys, propounds the following Interrogatories upon Defendant CITY OF CHICAGO to be answered under oath and in writing within thirty days.

DEFINITIONS AND INSTRUCTIONS

Plaintiff incorporates and restates the Definitions and Instructions set forth in Plaintiff's First Requests for Production of Documents as though fully set forth herein.

In addition, Plaintiff sets forth the following Definitions and Instructions:

1. "Identify" with respect to a lawsuit, shall mean to provide the case caption identifying the parties in the case, case number, name of presiding judge, and the final outcome of the case. If the lawsuit was settled or resulted in a verdict for a plaintiff, provide the monetary amount of the settlement or verdict.

2. "Polygraph Examinations" shall mean any interview conducted in the presence of a polygraph machine, regardless of whether the subject of the investigation was suspected or accused of any crime.
3. "Subject," in the context of a polygraph examination, shall mean the person whom the named examiner interviewed in the presence of a polygraph machine.
4. "Result," in the context of a polygraph examination, shall mean the named examiner's determination of the subject's truthfulness, regardless of the form in which the examiner recorded that determination.
5. "Lawsuit" shall mean any civil litigation filed by any party in any jurisdiction.

INTERROGATORIES

1. Please identify each polygraph examination conducted by Defendants Robert Tovar, John Stout, and/or James McArdle between January 1, 1985 and December 31, 1995 in homicide and/or sexual assault investigations conducted by the Chicago Police Department. For each polygraph examination, please identify:
 - a. The polygraph examiner;
 - b. The date and location of the polygraph examination;
 - c. The Records Division number(s) associated with the investigation;
 - d. The crime(s) under investigation;
 - e. The subject of the polygraph examination, including his or her date of birth;
 - f. The subject's relation or suspected relation to the crime (e.g., witness, suspect, victim);
 - g. The result of the polygraph examination (e.g., "deception indicated," "no deception indicated," "inconclusive" or otherwise);
 - h. Each person criminally charged as a result of the investigation, including his or her date of birth;
 - i. The final outcome and present status of the criminal case for each person charged;
 - j. The Log Numbers or Complaint Register Numbers associated with any Chicago police misconduct complaint that relates to the underlying criminal investigation; and
 - k. Any civil lawsuit that relates to the underlying criminal investigation.

Respectfully submitted,

COREY BATCHELOR

Dated: April 30, 2020

By: /s/Craig B. Futterman
One of his Attorneys

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CERTIFICATE OF SERVICE

The undersigned, an attorney, certifies that a copy of the foregoing document was served upon all parties of record by electronic mail on April 30, 2020.

/s/Craig B. Futterman
One of Plaintiff's Attorneys

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